

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ABBOTT GMBH & CO., KG,)	
ABBOTT BIORESEARCH CENTER, INC.,)	
AND ABBOTT BIOTECHNOLOGY LTD.,)	C.A. No. 4:09-CV-11340 (FDS)
)	
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
CENTOCOR ORTHO BIOTECH, INC. AND)	
CENTOCOR BIOLOGICS, LLC.,)	
)	
Defendant.)	

**DECLARATION OF MARISA C. BROWNDORF IN SUPPORT OF DEFENDANTS'
BILL OF COSTS**

I, Marisa C. Browndorf, declare and state that the following is true and correct to the best of my knowledge and belief:

1. I am a paralegal at the law firm Akin Gump Strauss Hauer and Feld LLP, and have been responsible for paralegal duties in this action.
2. My job responsibilities in this case included collecting original paper and electronic documents of Centocor Ortho Biotech, Inc. and Centocor Biologics, LLC (“Centocor”) and overseeing the electronic processing of these documents for production to plaintiffs’ counsel. My responsibilities also included processing and compiling the relevant electronic documents into deposition witness files for the 66 depositions which took place in this action, and compiling trial exhibits of both Plaintiffs and Defendants for the jury trial which took place in September of 2012.

3. I have reviewed the invoices attached as exhibits hereto. These include invoices from an outside vendor, Kelly and Partners, Inc. I have worked with Kelly and Partners as part of fulfilling my paralegal responsibilities in this case.

4. **Invoices Related to Document Production.** In this case, Centocor produced over 1.6 million pages of documents to Plaintiffs. Exhibit 6A are true and correct copies of invoices reflecting costs associated with copying approximately 19,000 pages of documents that were then converted into electronic format for production. These documents were collected from the client, copied on site, and then returned to the client. An outside vendor converted these copies from paper format to an agreed upon electronic format for production. A summary of these charges are reflected in Exhibit 6.

5. **Trial Exhibits.** Exhibit 6B are true and correct copies of invoices reflecting copying charges that were incurred as part of copying the parties' trial exhibits in this case. I have reviewed the Kelly and Partner invoices to identify the reason for the charges that were incurred. The parties had approximately 1700 combined trial exhibits, which included patent file histories, patents, non-patent prior art, interference pleadings and exhibits and other documents. Some of these documents are quite voluminous. The copying charges in Exhibit 6B include copies prepared for the original exchange of exhibits between the parties to satisfy the Pre-Trial Order. Additional copy sets were necessary for the Court, counsel and for the jury's convenience during the jury trial on September 10-25, 2012. These copies were present and available at trial and were therefore obtained for use in this case. A summary of these charges are reflected in Exhibit 6.

6. **Documents To Be Prepared As Potential Exhibits At Depositions.** Exhibit 6C are true and correct copies of invoices reflecting copying charges incurred as part of depositions

that were taken in this case. I have reviewed Kelly and Partner invoices that are included in Exhibit 6C. There were 66 depositions taken in this case. The invoices in Exhibit 6C reflect copy charges that were incurred for purposes of taking and defending these depositions. The copies that were made were typically of documents that were identified as being relevant to the deposition to be taken and in some instances, three copies of the documents would be made for purposes of deposition (one copy for each counsel and one for the witness). A summary of these charges are reflected in Exhibit 6.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink that reads "Marisa Browndorf". The signature is fluid and cursive, with "Marisa" on top and "Browndorf" on the bottom.

Date: April 22, 2013

Marisa C. Browndorf

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Declaration of Marisa C. Browndorf in Support of Defendants' Bill of Costs was electronically mailed to counsel of record on April 22, 2013.



Angela Verrecchio